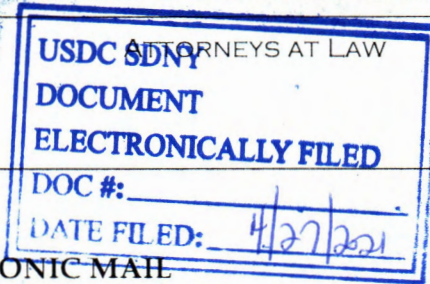


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April 26, 2021

VIA ECF AND ELECTRONIC MAIL

Hon. Colleen McMahon
United States District Judge
Daniel Patrick Moynihan Courthouse
Southern District of New York
500 Pearl Street
New York, NY 10007

*Request to modify bail conditions
from home confinement to a curfew
granted. Pretrial Services will
set the appropriate parameters of the curfew*

Re: United States v. Brandon Seegers, et al. 19 Cr. 686 (CM) - Request for modification of bail

Dear Judge McMahon:

I write to request that the Court modify Mr. Seegers' conditions of bail from home detention to imposition of a curfew. Neither Pretrial Services nor the government oppose this request. At the time of his arrest, Mr. Seegers was granted bail, subject to the following conditions: \$50,000 Personal Recognizance Bond, signed by one financially responsible person; travel restricted to SDNY/EDNY; all travel documents surrendered and travel documents (and no new applications); pretrial supervision as directed by Pretrial Services; Drug testing/treatment as directed by pretrial services; home detention; location monitoring; defendant to continue or seek employment, or start education program.

The modification is necessary to allow Mr. Seegers to start working again in his grandfather's (General Jeter) pest control company, Redcap Exterminating, and also allows him to perform errands for Mr. Jeeter who has been suffering from cancer for the past 3 years. In the last year and a half, Mr. Jeeter has been unable to walk without the use of a walker or wheelchair. Mr. Seegers has worked "off the books" in order to sustain Mr. Jeeter's business.

Typically, Mr. Seegers worked 5 days per week at Redcap Exterminating. Because of Mr. Seegers' ankle monitor, customers would report to Mr. Jeeter that they were uncomfortable with Mr. Seegers servicing their home. As a result, the business began losing customers, and Mr. Seegers stopped working.

Mr. Seegers has been visiting Mr. Jeeter at home, and has at times performed errands for him, like going to the grocery store. However, Pretrial Services in New Jersey has told

him that because his conditions of bail require home detention, he is not allowed to perform these errands, and would only be able to do so if bail were modified to a curfew.

With the exception of a summons issued to Mr. Seegers on January 22, 2021, in which he was stopped by a Union City Police Officer and found to be in possession of under 50 grams of marijuana, Mr. Seegers has complied with all conditions of bail. Mr. Seegers is currently enrolled in a GED program, and has also enrolled in a job training program with Exodus Transitional Community. Despite issuance of the summons, Mr. Seegers has shown substantial compliance with his conditions of bail, as well as focus and diligence regarding his work at Redcap Exterminating.

Accordingly, we request that the Court modify the conditions of bail and impose a curfew.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'K. Commissiong', written over a horizontal line.

Karloff C. Commissiong, Esq.

cc: A.U.S.A. Michael Herman (Via Electronic Mail)